

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF ARKANSAS
FAYETTEVILLE DIVISION

JILL DILLARD, JESSA SEEWALD,
JINGER VUOLO, and JOY DUGGAR,

Plaintiff,

Case No.: 5:17-CV-05089-TLB

CITY OF SPRINGDALE; WASHINGTON
COUNTY; KATHY O'KELLEY; ERNEST
CATE; RICK HOYT; STEVE ZEGA;
BAUER PUBLISHING COMPANY, L.P.;
BAUER MAGAZINE, L.P.; BAUER MEDIA
GROUP, INC.; BAUER, INC.; HEINRICH
BAUER NORTH AMERICA, INC.; BAUER
MEDIA GROUP USA, LLC; and DOES 1-10,
inclusive,

Defendant.

**DECLARATION OF STEVEN E. BLEDSOE IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO WASHINGTON COUNTY DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT**

I, Steven E. Bledsoe, declare as follows:

1. I am a partner with Larson LLP, attorneys of record for Plaintiffs. I have personal knowledge of the facts set forth herein. If called as a witness, I could and would competently testify to the matters stated herein. I make this declaration based in support of Declaration of Steven E. Bledsoe in Support of Opposition to Springdale Defendants' Motion for Summary Judgment.

2. Attached as **Exhibit 1** is a true and correct copy of the Washington County Sheriff's Office Incident Report, Exhibit 29 to the Deposition Transcript of Rick Hoyt, Jr. taken on September 17, 2021.

3. Attached as **Exhibit 2** is a true and correct copy of the excerpts from the Deposition Transcript of Kathy O’Kelley taken on August 25, 2021.

4. Attached as **Exhibit 3** is a true and correct copy of the excerpts from the Deposition Transcript of Ernest Cate taken on August 26, 2021.

5. Attached as **Exhibit 4** is a true and correct copy of the excerpts from the Deposition Transcript of Rick Hoyt, Jr. taken on September 17, 2021.

6. Attached as **Exhibit 5** is a true and correct copy of a (Highly Confidential – Attorneys’ Eyes Only) report by Plaintiffs’ expert Robert Wynne, Ph.D., MFT, dated May 2, 2021, document produced with Bates Nos. JD004498-JD004521.

7. Attached as **Exhibit 6** is a true and correct copy of the excerpts from an email chain dated May 20, 2015 between Ernest Cate, Captain Ron Hritz, O’Kelley and others, Exhibit 2 to the Deposition Transcript of Kathy O’Kelley taken on August 25, 2021.

8. Attached as **Exhibit 7** is a true and correct copy of the excerpts from the email dated May 19, 2015 from O’Kelley forwarding Captain Hritz’s email to the City of Arkansas Mayor Doug Sprouse, document produced with Bates No. Springdale2888.

9. Attached as **Exhibit 8** is a true and correct copy of a (Highly Confidential – Attorneys’ Eyes Only) report by Plaintiffs’ expert Robert Wynne, Ph.D., MFT, dated May 2, 2021, document produced with Bates Nos. JD004820-JD004844.

10. Attached as **Exhibit 9** is a true and correct copy of the excerpts from the email dated May 20, 2015 from Kathy O’Kelley to Abtin Mehdizadegan, Exhibit 4 to the Deposition Transcript of Kathy O’Kelley taken on August 25, 2021.

11. Attached as **Exhibit 10** is a true and correct copy of the excerpts from the email dated May 20, 2015-May 21, 2015 between Kathy O’Kelley, Ron Hritz, Ernest Cate, Amanda

LaFever and Mark Hayes, Exhibit 10 to the Deposition Transcript of Kathy O'Kelley taken on August 25, 2021.

12. Attached as **Exhibit 11** is a true and correct copy of the excerpts from the email chain dated May 20, 2015-May 21, 2015 between Kathy O'Kelley, and Abtin Mehdizadegan, Exhibit 3 to the Deposition Transcript of Kathy O'Kelley taken on August 25, 2021.

13. Attached as **Exhibit 12** is a true and correct copy of the excerpts from the email dated May 21, 2015 from Kathy O'Kelley to Ernest Cate, document produced with Bates No. Springdale1684.

14. Attached as **Exhibit 13** is a true and correct copy of the excerpts from the email dated May 21, 2015 from Gina Bacchiocchi to Springdale Police Dept., document produced with Bates No. Springdale0966.

15. Attached as **Exhibit 14** is a true and correct copy of the excerpts from the email dated May 21, 2015 from Gina Bacchiocchi to Springdale Police Dept., document produced with Bates No. Springdale2544.

16. Attached as **Exhibit 15** is a true and correct copy of the excerpts from the letter dated May 15, 2015 (FOIA Request) from Abtin Mehdizadegan to Washington County Sheriff's Office, Exhibit 30 to the Deposition Transcript of Rick Hoyt, Jr. taken on September 17, 2021.

17. Attached as **Exhibit 16** is a true and correct copy of the excerpts from the Order dated May 21, 2015 signed by Honorable Stacey Zimmerman in Circuit Court of Washington County, Arkansas, Case No. J-2007-38 , Exhibit 24 to the Deposition Transcript of Kathy O'Kelley taken on August 25, 2021.

18. Attached as **Exhibit 17** is a true and correct copy of the excerpts from the email dated June 5, 2015 from Rose Lawrence to Ron Hritz, document produced with Bates No.

Springdale0209.

19. Attached as **Exhibit 18** is a true and correct copy of the excerpts from the email dated June 4, 2015 from Dorothy Blackman to Ron Hritz, document produced with Bates No. Springdale0504.

20. Attached as **Exhibit 19** is a true and correct copy of the excerpts from the email dated June 5, 2015 from Rose Lawrence to Ron Hritz, document produced with Bates No. Springdale0203.

21. Attached as **Exhibit 20** is a true and correct copy of the excerpts from the email dated June 5, 2015 from Michael Zoltowski to Kathy O'Kelley, document produced with Bates No. Springdale0230.

22. Attached as **Exhibit 21** is a true and correct copy of the excerpts from the Twitter feed dated December 4, 2017-November 9, 2019, documents produced with Bates Nos. JD000001-JD000017.

23. Attached as **Exhibit 22** is a true and correct copy of the excerpts from the Deposition Transcript of Jill Dillard taken on September 1, 2021.

24. Attached as **Exhibit 23** is a true and correct copy of the excerpts from the Deposition Transcript of Jessa Seewald taken on September 13, 2021.

25. Attached as **Exhibit 24** is a true and correct copy of a report by Robert Wynne, dated May 2, 2021, document produced with Bates Nos. JD004649-JD004677.

26. Attached as **Exhibit 25** is a true and correct copy of the excerpts from the email dated May 21, 2015 from Ron Hritz to Mr. Duggar, document produced with Bates No. Springdale2863.

27. Attached as **Exhibit 26** is a true and correct copy of the excerpts from the

Deposition Transcript of Joy Anna Duggar Forsyth taken on August 30, 2021.

28. Attached as **Exhibit 27** is a true and correct copy of the excerpts from the Deposition Transcript of Jinger Vuolo taken on September 20, 2021.

29. Attached as **Exhibit 28** is a true and correct copy of a report by Robert Wynne, dated May 2, 2021, document produced with Bates Nos. JD005006-JD005030.

30. Attached as **Exhibit 29** is a true and correct copy of the Springdale Police Department Offense Report dated May 19, 2015, Exhibit 16 to the Deposition Transcript of Kathy O'Kelley taken on August 25, 2021.

31. Attached as **Exhibit 30** is a true and correct copy of the excerpts from the letter dated May 15, 2015 (FOIA Request) from Abtin Mehdizadegan to Springdale Police Department, Exhibit 1 to the Deposition Transcript of Kathy O'Kelley taken on August 25, 2021.

32. Attached as **Exhibit 31** is a true and correct copy of the excerpts from the (Highly Confidential – Attorneys' Eyes Only) Deposition Transcript of Defendants' expert Jason W. Beaman, D.O., taken on September 30, 2021.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on this 20th day of October, 2021, at Costa Mesa, California.

/s/ Steven E. Bledsoe
Steven E. Bledsoe